

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
WESTERN DIVISION**

LARRY FRAZIER,)	
)	
Plaintiff,)	
)	
v.)	No. 19–cv–50121
)	
WEXFORD HEALTH SOURCES, INC.,)	District Judge:
CGH MEDICAL CENTER, and)	Iain D. Johnston
MERRILL ZAHTZ, M.D.,)	
)	Magistrate Judge:
Defendants.)	Margaret J. Schneider

JOINT STATUS REPORT

NOW COMES the Plaintiff, LARRY FRAZIER, and the Defendants, WEXFORD HEALTH SOURCES, INC. and DR. MERRILL ZAHTZ, M.D. (together, “Wexford;” collectively, the “Parties”), through their respective undersigned counsel, and, for their Joint Status Report regarding the status of discovery, state as follows:

1. Pursuant to this Court’s Order of July 14, 2022, a status report is to be filed by September 14, 2022. (ECF 188). Below is the Parties’ Joint Status Report on the current state of fact discovery.

2. In addition to working with counsel for CGH Hospital over the past several weeks to secure the depositions of several CGH medical provider; on September 8, 2022, Wexford Defendants also issued subpoenas for those depositions of CGH medical providers that provided treatment to Plaintiff, including: (i) Dr. Thomas King, (ii) Dr. Heather Wakefield, (iii) Dr. Thomas McGlone, (iv) Mark Moran, PA-C, and (v) Theresa Krueger. The parties are in the process of scheduling those depositions in conjunction with CGH Hospital’s attorneys. Nurse Krueger is scheduled for October 12, 2022. The parties are in the process of scheduling the remaining

depositions.

3. Wexford Defendants will also be seeking the depositions of two medical providers from the University of Illinois Medical Center – Chicago (“UIC”), who provided treatment to Plaintiff after his alleged burn: (i) Dr. Effrossyni Gina Votta-Velis; and (ii) Dr. Francesco M. Bianco.

4. The deposition of Susan Tuell, NP, who provided treatment to Plaintiff while at Sheridan Correctional Center, is currently scheduled for October 6, 2022.

5. The deposition of Dr. Zahtz is tentatively being scheduled for the first week of November 2022.

6. On September 7, 2022, Plaintiff issued a Notice of Deposition pursuant to Rule 30(B)(6) for the deposition of Wexford’s corporate representative. Wexford is in the process of designating its corporate representative and aims to present him for his deposition in the next 45-days.

7. In light of the foregoing, the Parties remain optimistic that they will be able to complete these ten (10) depositions by December 1, 2022. If delays arise with scheduling the depositions of the CGH or UIC medical providers, the Parties anticipate filing a motion within the next 45-days for a short extension of time to complete fact discovery.

8. This completes the Parties’ Joint Status Report.

Dated: September 14, 2022

Respectfully submitted by:

For Plaintiff Larry Frazier

*For Defendants Wexford Health Sources,
Inc., and Dr. Merrill Zahtz*

By: /s/ Vincent C. Mancini

By: /s/ Victor F. Price

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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2022, I caused the foregoing document to be filed electronically with the Clerk of the Court through ECF and to be served upon all counsel of record by filing the same with the CM/ECF system.

By: /s/Victor F. Price